

Attachment 2

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-md-03047-YGR

MDL No. 3047

This Document Relates to:

ALL ACTIONS

**PLAINTIFFS' THIRD SET OF REQUESTS
FOR ADMISSION TO THE META
DEFENDANTS**

PROPOUNDING PARTY: MDL Personal Injury, Local Government, and State
Attorney General Plaintiffs

RESPONDING PARTIES: Defendants Meta Platforms, Inc., Instagram, LLC, Meta
Payments, Inc., Meta Platforms Technologies, LLC,
Facebook Payments, Inc., Siculus, Inc., and Facebook
Operations, LLC

SET: 3

DATE OF SERVICE: February 21, 2025

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Plaintiffs, through the undersigned counsel, propound the following Requests for Admission on Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Facebook Payments, Inc., Siculus, Inc., and Facebook Operations, LLC (collectively “Meta” or “Meta Defendants”). Responses to these Requests for Admission, or objections in lieu thereof, shall be served within 30 days after service of this document and in accordance with the definitions and instructions below.

I. DEFINITIONS

1. **“Child”** or **“Children”** means individual(s) under the age of thirteen (13).
2. **“collect,” “collects,” and “collection”** have the meaning provided in 16 C.F.R. § 312.2.
3. **“Facebook Platform”** or **“Facebook”** means any version of the Facebook platform made available for use, including versions for use on mobile devices or by accessing a URL on the internet, with or without logging into an account, and including all features or surfaces accessible to some or all users of the platform.
4. **“Instagram Platform”** or **“Instagram”** means any version of the Instagram platform made available for use, including versions for use on mobile devices or by accessing a URL on the internet, with or without logging into an account, and including all features or surfaces accessible to some or all users of the platform.
5. **“Personal information”** has the same meaning as the term is defined in 16 CFR § 312.2.
6. **“Teen”** or **“Teens”** means individuals between the ages of thirteen (13) and seventeen (17), inclusively.
7. **“User”** means a user of Facebook or Instagram, whether the individual has an account on either platform or not.
8. **“User Control”** means any feature of the Instagram Platform that allows users to tailor their profile or experience to their own unique preferences including, but not limited to,

1 private account, content control settings, DM reachability settings, time management settings,
2 notification restrictions, and interaction settings.

3 9. **“Verifiable parental consent”** has the meaning given to it by 16 C.F.R. § 312.2
4 (“Obtaining verifiable consent”).

5 10. **“You,” “Your,” “Defendant,” or “Defendants”** means the above-named
6 Responding Party or Parties (individually and, where applicable, collectively); each of their
7 predecessor or successor business entities; each foreign or domestic nongovernmental or private
8 corporation or entity with which they are commonly owned, including subsidiaries and parent
9 corporations; each of their former or present Units; and for each of the foregoing all former or
10 present directors, officers, members, partners, principals, employees, contractors, agents,
11 attorneys, experts, investigators, consultants, or other persons authorized to act on their behalf.

12 11. **“Your Platforms”** and **“Meta’s Platforms”** means the Facebook and Instagram
13 Platforms.

14 12. **“Youth”** means individuals under the age of twenty-two (22).

16 **II. RULES OF CONSTRUCTION**

17 1. The use of the conjunctive includes the use of the disjunctive and the use of the
18 disjunctive includes the use of the conjunctive.

19 2. The use of the singular form of any word includes the plural, and vice versa; and
20 the use of the masculine gender shall include the feminine and the neutral genders, and vice versa.

21 3. The use of any tense of any verb shall also include within its meaning all other
22 tenses of the verb.

23 4. A term or word defined herein is meant to include both the lower and upper case
24 reference to such term or word.

1 **III. INSTRUCTIONS**

2 1. Each matter contained herein shall be deemed admitted unless Plaintiffs receive a
3 written answer or objection to each Request, signed by counsel, within thirty (30) days after service
4 of these Requests.

5 2. If You deny, or refuse to admit, any Request, in whole or in part, You must “state
6 in detail why [You] cannot truthfully admit or deny” the Request, in accordance with Rule 36(a)(4)
7 of the Federal Rules of Civil Procedure.

8 3. You may not give lack of information or knowledge as a reason for Your failure to
9 admit or deny a request unless You state that You have made reasonable inquiry and that the
10 information known or readily obtainable by You is insufficient to enable You to admit or deny the
11 admission requested. Fed. R. Civ. P. 36(a)(4).

12 4. You may not object to a Request on grounds that the matter for which an admission
13 is requested presents a genuine issue for trial.

14 5. Unless otherwise indicated, the relevant time period for the information sought is
15 2012 to the present (“Relevant Time Period”).
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **IV. REQUESTS FOR ADMISSION**

2
3 **REQUEST NO. 18.**

4 Admit that You do not provide notice (as described in 16 CFR § 312.4) of what
5 information You collect from Children on Facebook or Instagram, how You use such
6 information, or Your disclosure practices for such information.

7 **RESPONSE:**

8
9 **REQUEST NO. 19.**

10 Admit that You do not obtain Verifiable parental consent to collect, use, and/or disclose
11 personal information that You collect from Children who visit Facebook with or without
12 logging into an account.

13 **RESPONSE:**

14
15 **REQUEST NO. 20.**

16 Admit that You do not provide a means for a parent to review the personal information
17 collected from their Children who visit Facebook with or without logging into an account, in a
18 manner described in 16 CFR § 312.6(a)(3).

19 **RESPONSE:**

20
21 **REQUEST NO. 21.**

22 Admit that You do not provide a means for a parent to refuse to permit the further use or
23 maintenance of the information collected from their Child on Your Platforms, in the manner
24 described in 16 CFR § 312.6(a)(2).

25 **RESPONSE:**

26
27 **REQUEST NO. 22.**

28 Admit that, during the period from October 2020 until December 2021, when You

1 determined a User was likely a Child and disabled their Facebook or Instagram account, You
2 did not immediately disable any other Facebook or Instagram account the User had linked in the
3 Accounts Center feature.

4 **RESPONSE:**

5
6 **REQUEST NO. 23.**

7 Admit that, from at least April 2016 through September 2020, when You determined a
8 User was likely a Child and disabled their Facebook or Instagram account, You did not
9 immediately disable any other Facebook or Instagram account the User had linked in the Linked
10 Accounts feature.

11 **RESPONSE:**

12
13 **REQUEST NO. 24.**

14 Admit that Exhibit A, Meta's Form 10-K for year 2024, accurately reports Meta's
15 financial results as reported to the Securities & Exchange Commission.

16 **RESPONSE:**

17
18 **REQUEST NO. 25.**

19 Admit that for fiscal year 2024, Meta reported \$164,501,000,000.00 in gross revenue to
20 the Securities & Exchange Commission.

21 **RESPONSE:**

22
23 **REQUEST NO. 26.**

24 Admit that for fiscal year 2024, Meta reported \$69,380,000,000.00 in net revenues to the
25 Securities & Exchange Commission.

26 **RESPONSE:**

REQUEST NO. 27.

Admit that for fiscal year 2024, Meta reported \$5,070,000,000.00 in dividends to the Securities & Exchange Commission.

RESPONSE:

REQUEST NO. 28.

Admit that for fiscal year 2024, Meta reported \$52,103,000,000.00 in free cash flow to the Securities & Exchange Commission.

RESPONSE:

REQUEST NO. 29.

Admit that for fiscal year 2024, Meta reported \$62,360,000,000.00 in profits to the Securities & Exchange Commission.

RESPONSE:

REQUEST NO. 30.

Admit that prior to the launch of Teen Accounts in September 2024, Instagram Platform did not default all Users under 16 years old into the platform's strictest User Control settings.

RESPONSE:

REQUEST NO. 31.

Admit that You never disclosed to the public any statistics or results from the Bad Experiences & Encounters Framework (BEEF) surveys.

RESPONSE:

REQUEST NO. 32.

Admit that You never disclosed to the public any statistics or results from the Tracking Reach of Integrity Problems Survey (TRIPS).

1 **RESPONSE:**

2
3 **REQUEST NO. 33.**

4 Admit that Meta tracked “time spent” as a guardrail metric during certain time periods.

5 **RESPONSE:**

6
7 **REQUEST NO. 34.**

8 Admit that increasing User "time spent" on Meta’s Platforms is or was an articulated goal
9 at Meta at least once during the Relevant Time Period.

10 **RESPONSE:**

11
12 **REQUEST NO. 35.**

13 Admit that You never disclosed to the public that increasing User "time spent" on Meta’s
14 Platforms is or was an articulated goal at Meta.

15 **RESPONSE:**

16
17 **REQUEST NO. 36.**

18 Admit that the statements attributed to Eva Chen in the following article were made when
19 Eva Chen was authorized to speak on Meta’s behalf: Sangeeta Singh-Kurtz, *Instagram is*
20 *building a team to stop people from feeling bad on Instagram*, Quartz (April 3, 2018),
21 <http://archive.today/Wvh7k>.

22 **RESPONSE:**

23
24 **REQUEST NO. 37.**

25 Admit that the statement attributed to Facebook in the following article was made by a
26 Meta employee authorized to speak on Meta’s behalf: Hilary Andersson, *Social Media Apps Are*
27 *Deliberately “Addictive” to Users*, BBC (July 4, 2018), <https://archive.ph/Hxrp8>.

28 **RESPONSE:**

REQUEST NO. 38.

Admit that the statements attributed to Instagram and Facebook in the following article were made by Meta employees authorized to speak on Meta's behalf: *Mental Health: UK could ban social media over suicide images, minister warns*, BBC (Jan. 27, 2019), <https://www.bbc.com/news/uk-47019912>.

RESPONSE:**REQUEST NO. 39.**

Admit that the statements attributed to a Facebook spokesperson in the following article were made by a Meta employee authorized to speak on Meta's behalf: Lauren Feiner, *More than 40 attorneys general ask Facebook to abandon plans to build Instagram for kids*, CNBC (May 10, 2021), <https://www.cnbc.com/2021/05/10/attorneys-general-ask-facebook-to-abandon-instagram-for-kids-plans.html>.

RESPONSE:**REQUEST NO. 40.**

Admit that the statements attributed to Elizabeth Lagone, Meta, and "a Meta executive" in the following article were made by Meta employees authorized to speak on Meta's behalf: Adam Satariano, *British Ruling Pins Blame on Social Media for Teenager's Suicide*, N.Y. Times (Oct. 1, 2022), <https://www.nytimes.com/2022/10/01/business/instagram-suicide-ruling-britain.html>.

RESPONSE:**REQUEST NO. 41.**

Admit that Meta has never implemented a feature that automatically or by default limits time spent on Meta's Platforms for adolescent Users.

RESPONSE:

REQUEST NO. 42.

Admit that Meta has never implemented a feature that automatically or by default limits use of Meta's Platforms to non-school hours for adolescent Users.

RESPONSE:

REQUEST NO. 43.

Admit that Meta has never implemented a feature that automatically or by default limits Meta's Platforms' use in a manner that would prevent disrupting adolescent sleeping hours.

RESPONSE:

REQUEST NO. 44.

Admit that Meta never warned adolescent Users or their guardians about the potential risks to adolescent well-being and mental health associated with use of Meta's Platforms.

RESPONSE:

REQUEST NO. 45.

Admit that Meta generates substantially all of its revenue from selling advertising placements on its family of apps to marketers.

RESPONSE:

REQUEST NO. 46.

Admit that Meta uses the personal information it gathers about Users, regardless of age, to better target its advertising services.

RESPONSE:

REQUEST NO. 47.

Admit that Meta associates information collected about individuals who visit Facebook or Instagram pages without logging in (including information about how they interact with

1 Facebook or Instagram) with one or more identifiers described in the definition of “personal
2 information” in 16 CFR § 312.2.

3 **RESPONSE:**

4
5 **REQUEST NO. 48.**

6 Admit that the personal information You collect from individuals who visit Facebook or
7 Instagram pages without logging in is used for targeting advertisements to those individuals.

8 **RESPONSE:**

Dated: February 21, 2025

PHILIP J. WEISER

Attorney General
State of Colorado

/s/ Elizabeth Orem

Krista Batchelder (CO Reg. 45066),
pro hac vice
Deputy Solicitor General
Shannon Stevenson (CO Reg. 35542),
pro hac vice
Solicitor General
Elizabeth Orem (CO Reg. 58309), pro hac
vice

Assistant Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203

Phone: (720) 508-6384

krista.batchelder@coag.gov

Shannon.stevenson@coag.gov

Elizabeth.orem@coag.gov

*Attorneys for Plaintiff State of Colorado, ex
rel. Philip J. Weiser, Attorney General*

ROB BONTA

Attorney General
State of California

/s/ Joshua Olszewski-Jubelirer

Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
David Beglin (CA SBN 356401)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN
336428)

Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)

Deputy Attorneys General
California Department of Justice

Office of the Attorney General

1515 Clay Street, Suite 2000

Oakland, CA 94612

Phone: (510) 879-1300

Fax: (510) 622-2270

Joshua.OlszewskiJubelirer@doj.ca.gov

*Attorneys for Plaintiff the People of the State
of California*

RUSSELL COLEMAN

Attorney General
Commonwealth of Kentucky

/s/ Daniel I. Keiser

J. Christian Lewis (KY Bar No. 87109),
Pro hac vice
Philip Heleringer (KY Bar No. 96748),
Pro hac vice
Zachary Richards (KY Bar No. 99209),
Pro hac vice
Daniel I. Keiser (KY Bar No. 100264),
Pro hac vice
Matthew Cocanougher (KY Bar No. 94292),
Pro hac vice
Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
CHRISTIAN.LEWIS@KY.GOV
PHILIP.HELERINGER@KY.GOV
ZACH.RICHARDS@KY.GOV
DANIEL.KEISER@KY.GOV
MATTHEW.COCANOUGH@KY.GOV
Phone: (502) 696-5300
Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of
Kentucky*

MATTHEW J. PLATKIN

Attorney General
State of New Jersey

/s/ Thomas Huynh

Kashif T. Chand (NJ Bar No. 016752008),
Pro hac vice
Section Chief, Deputy Attorney General
Thomas Huynh (NJ Bar No. 200942017),
Pro hac vice
Assistant Section Chief, Deputy Attorney
General
Verna J. Pradaxay (NJ Bar No. 335822021),
Pro hac vice
Mandy K. Wang (NJ Bar No. 373452021),
Pro hac vice
Deputy Attorneys General
New Jersey Office of the Attorney General,
Division of Law
124 Halsey Street, 5th Floor
Newark, NJ 07101
Tel: (973) 648-2052
Kashif.Chand@law.njoag.gov
Thomas.Huynh@law.njoag.gov
Verna.Pradaxay@law.njoag.gov
Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiffs New Jersey Attorney
General and the New Jersey Division of
Consumer Affairs Matthew J. Platkin,
Attorney General for the State of New Jersey,
and Cari Fais, Director of the New Jersey
Division of Consumer Affairs*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Previn Warren

PREVIN WARREN

MOTLEY RICE LLC

401 9th Street NW Suite 630

Washington DC 20004

Telephone: 202-386-9610

pwarren@motleyrice.com

LEXI J. HAZAM

LIEFF CABRASER HEIMANN &

BERNSTEIN, LLP

275 BATTERY STREET, 29TH FLOOR

SAN FRANCISCO, CA 94111-3339

Telephone: 415-956-1000

lhazam@lchb.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER

SEEGER WEISS, LLP

55 CHALLENGER ROAD, 6TH FLOOR

RIDGEFIELD PARK, NJ 07660

Telephone: 973-639-9100

cseeger@seegerweiss.com

Counsel to Co-Lead Counsel

JENNIE LEE ANDERSON

ANDRUS ANDERSON, LLP

155 MONTGOMERY STREET, SUITE 900

SAN FRANCISCO, CA 94104

Telephone: 415-986-1400

jennie@andrusanderson.com

Liaison Counsel

EMILY C. JEFFCOTT

MORGAN & MORGAN

633 WEST FIFTH STREET, SUITE 2652

LOS ANGELES, CA 90071

Telephone: 213-787-8590

ejeffcott@forthepeople.com

JOSEPH VANZANDT

BEASLEY ALLEN

234 COMMERCE STREET

MONTGOMERY, LA 36103

Telephone: 334-269-2343

joseph.vanzandt@beasleyallen.com

Federal/State Liaisons

MATTHEW BERGMAN
GLENN DRAPER
SOCIAL MEDIA VICTIMS LAW CENTER
821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org
glenn@socialmediavictims.org

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 BROADWAY
NEW YORK, NY 10003
Telephone: 212-558-5500
jbilsborrow@weitzlux.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 MADISON AVE, 7TH FLOOR
NEW YORK, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

ANDRE MURA
GIBBS LAW GROUP, LLP
1111 BROADWAY, SUITE 2100
OAKLAND, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 WALNUT STREET
SUITE 500
PHILADELPHIA, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN
RON AUSTIN LAW
400 MANHATTAN BLVD.
HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

PAIGE BOLDT
WALSH LAW
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@alexwalshlaw.com

THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701-1100
tcartmell@wcllp.com

SARAH EMERY
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KY 40202
Telephone: 859-600-6725
semery@justicestartshere.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
Telephone: 646-666-8908
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KY 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

SIN-TING MARY LIU
**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**

1 17 EAST MAIN STREET, SUITE 200
2 PENSACOLA, FL 32502
3 Telephone: 510-698-9566
4 mliu@awkolaw.com

5 JAMES MARSH
6 **MARSH LAW FIRM PLLC**
7 31 HUDSON YARDS, 11TH FLOOR
8 NEW YORK, NY 10001-2170
9 Telephone: 212-372-3030
10 jamesmarsh@marshlaw.com

11 JOSEPH E. MELTER
12 **KESSLER TOPAZ MELTZER & CHECK LLP**
13 280 KING OF PRUSSIA ROAD
14 RADNOR, PA 19087
15 Telephone: 610-667-7706
16 jmeltzer@ktmc.com

17 HILLARY NAPPI
18 **HACH & ROSE LLP**
19 112 Madison Avenue, 10th Floor
20 New York, New York 10016
21 Telephone: 212-213-8311
22 hnappi@hrsclaw.com

23 EMMIE PAULOS
24 **LEVIN PAPANTONIO RAFFERTY**
25 316 SOUTH BAYLEN STREET, SUITE 600
26 PENSACOLA, FL 32502
27 Telephone: 850-435-7107
28 epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, PC
1500 ROSECRANS AVE., STE. 500
MANHATTAN BEACH, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: 818-839-2333
rtellis@baronbudd.com
dfernandes@baronbudd.com

MELISSA YEATES
KESSLER TOPAZ MELTZER & CHECK LLP
280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205-855-5700
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

Attorneys for Individual Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on February 21, 2025 to Counsel for Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Facebook Payments, Inc., Siculus, Inc., and Facebook Operations, LLC:

MetaNoticeofService@cov.com

ASHLEY M. SIMONSEN, SBN 275203
asimonsen@cov.com
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Tel.: 424-332-4800

PHYLLIS A. JONES, pro hac vice
pajones@cov.com
PAUL W. SCHMIDT, pro hac vice
pschmidt@cov.com
MICHAEL X. IMBROSCIO, pro hac vice
mimbrosio@cov.com
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Tel.: 202-662-6000

Dated: February 21, 2025

/s/ Joshua Olszewski-Jubelirer
Joshua Olszewski-Jubelirer